

FASULO BRAVERMAN & DI MAGGIO, LLP

ATTORNEYS AT LAW

Hon. Mary Kay Vyskocil
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York

April 7, 2021

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Re: USA v. Encarnacion-Velez et al. (Ismael Gonzalez)
Case No.: 21 Cr. 225 (MKV)

Dear Judge Vyskocil,

I was assigned to represent Ismael Gonzalez in the above referenced matter. For the reasons stated herein, I respectfully request a modification of the current bail package to substitute two (2) Financially Responsible People (herein FRP's) with two (2) Moral Suasions.

Mr. Gonzalez's current conditions of release consist of a \$100,000 bond co-signed by 2 FRP's by today, Wednesday, April 7. Despite his best efforts, Mr. Gonzalez has been unable to secure two people who meet the financial criteria to sign the bond. That said, his family members are willing to sign as moral suasions. The proposed moral suasions are: (1) his younger brother, Jamie Gonzalez, who in 2016 worked in construction but is presently unemployed and receiving Disability; and (2) his aunt Wanda Gonzalez who worked as a home attendant for 30 years and is presently receiving Social Security.

I have discussed this substitution with AUSA Matthew Shahabian and he has indicated the Government has no objection to this request.

Thank you for your consideration of this matter. Should you require any additional information, please do not hesitate to contact me.

Respectfully submitted,

s/Louis V. Fasulo

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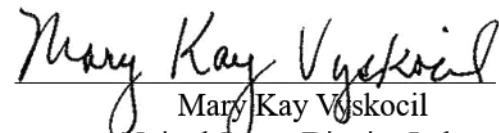
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Cc: AUSA Matthew Shahabian

Granted. SO ORDERED. Meet the new conditions by
April 23, 2021.

Date: April 16, 2021
New York, New York



Mary Kay Vyskocil
United States District Judge

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